

1 JOSEPH P. RUSSONIELLO (CASBN 44332)
United States Attorney

2 BRIAN J. STRETCH (CSBN 163973)
3 Chief, Criminal Division

4 MATTHEW A. PARRELLA (NYSBN 2040855)
JEFFREY D. NEDROW (CASBN 161299)
5 JEFFREY R. FINIGAN (CASBN 168285)
Assistant United States Attorneys

6
7 450 Golden Gate Avenue
San Francisco, California 94102
8 Telephone: (415) 436-7232
Facsimile: (415) 436-7234
9 Email: jeffrey.finigan@usdoj.gov

10 Attorneys for Plaintiff

11
12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15 UNITED STATES OF AMERICA,) Criminal No. CR 07-0732 SI

16 Plaintiff,)

17 v.)

18 BARRY LAMAR BONDS,)

19 Defendant.)

20
21 **STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME**

22
23 The above-captioned matter came before the Court on March 21, 2008. The defendant
24 was represented by Allen Ruby, Esq., and others, and the government was represented by
25 Matthew Parrella, Assistant United States Attorney, and others. The matter was continued to
26 June 6, 2008, at 11:00 a.m. in this Court for status.

27 The Court made a finding that the time from and including March 21, 2008, through June
28 6, 2008, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because the

STIPULATION AND [PROPOSED]
ORDER EXCLUDING TIME
CR 07-0732 SI

1 ends of justice served by taking such action outweighed the best interest of the public and the
2 defendant in a speedy trial. The finding was based on the need for the defendant to have
3 reasonable time necessary for effective preparation, taking into account the exercise of due
4 diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv). The finding
5 was also based upon the government's representation that it intends to seek a superseding
6 indictment prior to June 6, 2008, and its request for a sufficient amount of time to accomplish
7 that.

8 The parties hereby agree to and request that the case be continued until June 6, 2008, and
9 that the exclusion of time until then be granted. The parties agree and stipulate that the
10 additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A),
11 because the ends of justice served by this continuance outweigh the best interest of the public and
12 the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively
13 prepare, taking into account the exercise of due diligence, and will provide for continuity of
14 counsel for the defendant. This time exclusion will also allow government counsel time to seek a
15 superseding indictment.

16
17 DATED: April 1, 2008 /s/
18
19
20
21 ALLEN RUBY
22 Counsel for Barry L. Bonds
23

24 DATED: April 1, 2008 /s/
25 JEFFREY FINIGAN
26 Assistant U.S. Attorney
27
28

So ordered.

DATED: _____
24 SUSAN ILLSTON
25 UNITED STATES DISTRICT COURT JUDGE
26
27
28